

QUALITY ASSURANCE DIVISION
LICENSING AND CERTIFICATION BUREAU
PROVIDER INFORMATION NOTICE # 120508

Medication Passes in the Long Term Care Setting

The State Survey Agency (SSA) frequently issues citations regarding improper medication passes, specifically regarding pre-pouring medications to be given at a later time. These citations concern Long Term Care Tags F281 (professional standards of care), F332 (medication errors), F333 (significant medication errors) and F514 (complete medical records). Whereas the State Operation Manual (SOM) does not specifically address pre-pouring medications, the SSA has discussed the issue with the Regional Office (RO) for the Center for Medicare and Medicaid Services (CMS) office on several occasions. The RO has also performed quality assurance reviews of the SSA and cited similar deficiencies during comparative surveys.

The following guidance is provided in an effort to clarify this issue and to notify all providers of the SSA's expectations regarding medication passes and the practice of pre-pouring of medications. CMS guidance on this part of the survey process is located at: http://www.cms.hhs.gov/manuals/Downloads/som107ap_p_ltcf.pdf (Beginning on page 73)

Pre-pouring medications is not considered deficient practice in and of itself. The SSA recognizes that the long term care setting differs from the acute care setting in a few ways. First, long term care residents are typically in the facility longer than acute care hospital patients, making them and their care needs more familiar to staff. Second, long term care residents typically receive medications that are familiar to them. Third, they receive fewer one time or limited duration courses of medications.

The focus of medication administration is to ensure the process is performed correctly, safely and without errors while maintaining the security of the medications. Surveyor observation of the medication pass process will focus on the established standard of practice that includes the Seven Rights of Medication Administration:

- Right Resident
- Right Drug
- Right Dose
- Right Route
- Right Time
- Right Documentation
- Right Evaluation of Efficacy of the Medication

The proper administration of medications also includes medication-specific monitoring. (e. g. monitoring apical pulse, laboratory values, blood pressure readings, behaviors necessitating psychotropic meds, etc.)

The SSA recognizes the following:

- Preparing and pre-pouring medications in the medication room may augment accuracy as the licensed nurse preparer would have fewer interruptions.
- Pre-pouring and administering medications for one resident at a time may lead to timing errors; that is to say, medications may be delayed if a nurse prepares one resident's medications, administers them, and then prepares another resident's medications, etc.
- Pre-pouring medications for the entire shift or longer is not acceptable practice.
- Pre-pouring medications for another staff member to administer is not acceptable practice. The nurse who prepares the medications must administer the medications and maintain accountability for the security and administration of the medications.
- Pre--pouring of schedule II medications is not acceptable as the controlled substance is no longer secured in a separately locked, permanently affixed compartment.